

ESTTA Tracking number: **ESTTA672293**

Filing date: **05/14/2015**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Applicant:	Cenovus Energy Inc.
Application Serial Number:	86329409
Application Filing Date:	07/07/2014
Mark:	CENOVUS ENERGY
Date of Publication	04/14/2015

First 90 Day Request for Extension of Time to Oppose for Good Cause

Pursuant to 37 C.F.R. Section 2.102, Vermillion Intellectual Property Corporation, 909 # 17 Ave SW, Suite 400, Calgary, AB T2T 0A4, CANADA, a corporation organized under the laws of Canada, respectfully requests that it be granted a 90-day extension of time to file a notice of opposition against the above-identified mark for cause shown.

Potential opposer believes that good causes are established for this request by:

- The potential opposer needs additional time to investigate the claim
- The potential opposer needs additional time to confer with counsel
- The potential opposer needs additional time to seek counsel to represent it in this matter
- *For over seven years, the potential opposer has been a social enterprise engaged in the United States and worldwide in developing a non-partisan system (the "Vermillion System") for (i) promoting full-spectrum sustainable development (which is comprised of the three dimensions of people, planet and community prosperity), (ii) improving industry-specific data collection and benchmarking regarding those three dimensions, (iii) improving public literacy about the industry-specific issues and differences, and (iv) promoting constructive multi-stakeholder discussions about the nature of industry-specific leadership. As a social enterprise, the potential opponent is not awash in funding or funding sources the way conventional profit-seeking companies can often be. In that context, the potential opposer has only recently learned of the applicant's claims and their resemblance to those of the Vermillion System, so the potential opposer definitely needs additional time to (i) investigate the claims of the applicant and assess the risks of confusion and/or tarnishment to the Vermillion System and (ii) identify and confer with experienced US counsel willing to advise and/or represent. Furthermore, the potential opposer also needs to initiate discussions with the applicant regarding the possibilities, if any may exist, for settlement.*

The time within which to file a notice of opposition is set to expire on 05/14/2015. Vermillion Intellectual Property Corporation respectfully requests that the time period within which to file an opposition be extended until 08/12/2015.

Respectfully submitted,
/wade ferguson/
05/14/2015

Wade Ferguson

Director

Vermillion Intellectual Property Corporation

909 # 17 Ave SW, Suite 400

Calgary, AB T2T 0A4

CANADA

wade.ferguson@vermillioncommunityservices.org